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START

TO: Cliff Clark 11/02/92

FROM: Dan Duncan EPA
Cathy Massimino

The Permittee shall not exceed 100% of the rated capacity of the first charcoal filter and shall changeout the first charcoal filter within twenty-four (24) hours of detecting breakthrough. The Permittee shall change out the charcoal filter so as not to exceed 100% of the rated capacity of the charcoal filter based upon the either of the following methods:

(1) complete and maintain a running count of the volatile inventory on a per batch basis of spiked and/or non-spiked constituents and changeout the charcoal filter so as not to exceed 100% of the capacity of the carbon filter; or

(2) changeout the charcoal filter after processing a maximum of seven (7) one-thousand (1,000) gallon batches (7,000 gallons) of spiked waste water or three-hundred and forty-three (343) one thousand (1,000) gallon batches (343,000 gallons) of non-spiked waste water. For the purpose of this condition in the event of processing a mixed batch of spiked and non-spiked waste water the following shall be used to determine changeout:

(14lbs/1,000 gallons of spiked waste water)x(# gallons of spiked waste water processed) + (.32lbs/1,000 gallons of non-spiked waste water)x(# gallons of non-spiked waste water processed) = 110 lbs.

For Discussion
Duplic Nov 5th
9:30 Am Conference ←
Call.

Post-it™ brand fax transmittal memo 7671 | # of pages ▸

To Sue Priest	From Cliff Clark
Co.	Co. DOE
Dept.	Phone #
Fax #	Fax #

OR

TO: Cliff Clark: DOE-RL 10/26/92

From: Dan Duncan/Cathy Massimino: EPA

1. The following additional information is provided regarding our initial review of your October 21 and 23, 1992 submittals. The referenced RD&D Draft Permit Conditions are attached for your review and information.

o 3,000 Gallon Tank Integrity Assessment: Draft Permit Condition IV.C.3 requires that the structural integrity of the double shell tanks be performed every five (5) years. The integrity assessment must be included in the Operating Record.

o LERF Ventilation System: Draft Permit Condition V.D.3.a. specifies that the LERF Units shall be vented to a ventilation system designed, operated, monitored, and maintained equivalent or superior to the system in Section 4.1.3.

o Operating Parameter Review: Draft Permit Condition IV.C.2.a requires that the Operating Parameters to be reviewed prior to startup of the RD&D Waste Water Pilot Plant.

o VOC Analyzer Breakthrough: The alarm and visual alarm control setpoint will be set at 1 ppm in the RD&D Permit. Draft Permit Condition IV.C.3.a. specifies breakthrough of the first stage charcoal absorber will be considered to be 1 ppm.

o Catch Tank Capacity: Additional information verifying the capacity of the catch tank is required i.e. the basis for the 199 gallons.

2. Cathy and I will be available on November 5, 1992 at 9:00 am for a conference call to discuss these and any other items.

3. If any additional information is required, call me on 3-6693.

cc: Steve Skurla: WHC

9312260504

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL # of pages ▶ 2

To STEVE SKURLA	From DAN DUNCAN
Dept./Agency	Phone # (206) 553-6693
Fax # (509) 376-6476	Fax # (206) 553-8509

NSN 7540-01-317-7368 5099-101

IV.C.2.a. The Permittees shall submit to the Director and the Administrator a written assessment reviewed and certified by an independant, qualified registered professional engineer, in accordance with Section 270.11(d) and WAC 173-303-810 attesting whether the control setpoints which activate feed pump shutdown for units identified in permit condition V.A. are set at above or below the level which result in the hazard specified on Table 4-4 of Attachment 4. Based on this assessment the Permittees shall modify any control setpoints that do not activate feed pump shutdown prior to occurence of the hazard. The Permittee shall submit with the written assessment revisions to Attachment 4 of this permit to reflect these corrections to the control setpoints. These revisions to Attachment 4 of this permit to reflect these corrections to the control setpoints shall not be considered modifications to this permit and shall be implemented in accordance with permit condition II.N.

IV.C.3. The Permittees shall review, pursuant to Section 264.192(b) and WAC 173-303-640(2)(c), the structural integrity of the two Double Shell Tanks every five (5) years starting from the date the two Double Shell Tanks are installed. The initial structural integrity review shall also include testing for tightness pursuant to Section 264.192(d) and WAC 173-303-640(2)(e). Results of the integrity assessments shall be included in the Operating Record accessible at the facility. If either of the two Double Shell Tanks are found to be leaking or unfit for service, it must be immediately removed from service and the Permittees shall comply with Section 264.196 and WAC 173-303-640(7). The Permittees may not return the tank to service until he/she has obtained the required certification.

V.D.2.h. Subsection 4.1.3.2., page 4-6, last paragraph, sixth sentence, revise as follows: Breakthrough of the first stage charcoal adsorber will be considered to be at 1 parts per million as shown on the organic vapor analyzer.

V.D.3.a. The Liquid Effluent Retention Facility Units identified in permit condition V.A. shall be vented to a ventilation system designed, operated, monitored and maintained equivalent or superior to the system specified in Subsection 4.1.3, Figure 4-2, and Table 4-4 of Attachment 4 of this permit, Appendix 6, Appendix 5A, of this Permit and Attachment 7, Appendix 5B, of this Permit, for the 1706-KE Building Units identified in permit condition V.A.

TO: Cliff Clark: DOE-RL 10/26/92

From: Dan Duncan/Cathy Massimino: EPA

1. The following additional information is provided regarding our initial review of your October 21 and 23, 1992 submittals. The referenced RD&D Draft Permit Conditions are attached for your review and information.

o 3,000 Gallon Tank Integrity Assessment: Draft Permit Condition IV.C.3 requires that the structural integrity of the double shell tanks be performed every five (5) years. The integrity assessment must be included in the Operating Record.

more info on truck loading ventilation system

o LERF Ventilation System: Draft Permit Condition V.D.3.a. specifies that the LERF Units shall be vented to a ventilation system designed, operated, monitored, and maintained equivalent or superior to the system in Section 4.1.3.

o Operating Parameter Review: Draft Permit Condition IV.C.2.a requires that the Operating Parameters to be reviewed prior to startup of the RD&D Waste Water Pilot Plant.

More info on analyzer provide calculations supporting 25 ppm

o VOC Analyzer Breakthrough: The alarm and visual alarm control setpoint will be set at 1 ppm in the RD&D Permit. Draft Permit Condition IV.C.3.a. specifies breakthrough of the first stage charcoal absorber will be considered to be 1 ppm.

o Catch Tank Capacity: Additional information verifying the capacity of the catch tank is required i.e. the basis for the 199 gallons.

2. Cathy and I will be available on November 5, 1992 at 9:00 am for a conference call to discuss these and any other items.

3. If any additional information is required, call me on 3-6693.

cc: Steve Skurla: WHC

instrument info. at LERF
procedure for handling air emissions at LERF

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL # of pages ▶ 2

To	From
STEVE SKURLA	DAN DUNCAN
Dept./Agency	Phone # (206) 553-6693
Fax # (509) 376-6476	Fax # (206) 553-8509

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

IV.C.2.a. The Permittees shall submit to the Director and the Administrator a written assessment reviewed and certified by an independant, qualified registered professional engineer, in accordance with Section 270.11(d) and WAC 173-303-810 attesting whether the control setpoints which activate feed pump shutdown for units identified in permit condition V.A. are set at above or below the level which result in the hazard specified on Table 4-4 of Attachment 4. Based on this assessment the Permittees shall modify any control setpoints that do not activate feed pump shutdown prior to occurence of the hazard. The Permittee shall submit with the written assessment revisions to Attachment 4 of this permit to reflect these corrections to the control setpoints. These revisions to Attachment 4 of this permit to reflect these corrections to the control setpoints shall not be considered modifications to this permit and shall be implemented in accordance with permit condition II.N.

IV.C.3. The Permittees shall review, pursuant to Section 264.192(b) and WAC 173-303-640(2)(c), the structural integrity of the two Double Shell Tanks every five (5) years starting from the date the two Double Shell Tanks are installed. The initial structural integrity review shall also include testing for tightness pursuant to Section 264.192(d) and WAC 173-303-640(2)(e). Results of the integrity assessments shall be included in the Operating Record accessible at the facility. If either of the two Double Shell Tanks are found to be leaking or unfit for service, it must be immediately removed from service and the Permittees shall comply with Section 264.196 and WAC 173-303-640(7). The Permittees may not return the tank to service until he/she has obtained the required certification.

V.D.2.h. Subsection 4.1.3.2., page 4-6, last paragraph, sixth sentence, revise as follows: Breakthrough of the first stage charcoal adsorber will be considered to be at 1 parts per million as shown on the organic vapor analyzer.

V.D.3.a. The Liquid Effluent Retention Facility Units identified in permit condition V.A. shall be vented to a ventilation system designed, operated, monitored and maintained equivalent or superior to the system specified in Subsection 4.1.3, Figure 4-2, and Table 4-4 of Attachment 4 of this permit, Appendix 6, Appendix 5A, of this Permit and Attachment 7, Appendix 5B, of this Permit, for the 1706-KE Building Units identified in permit condition V.A.

III.A. **UNIT IDENTIFICATION**

The Permittees may store dangerous waste in containers in the units identified on Figures F4-1, F4-18, F4-19, F4-20 through F4-24, of Attachment 4 of this Permit and listed below subject to the terms of this Permit:

Two Tank Trailer Containers to be located at either the 1706-KE Building as depicted on Figures F4-1, F4-23, and F4-24, of Attachment 4 of this Permit, or the Liquid Effluent Retention Facility as depicted on Figures F4-20 through F4-22, of Attachment 4 of this Permit.

III.B. **WASTE IDENTIFICATION**

The Permittees may store the following dangerous wastes in the two Tank Trailer Containers identified in permit condition III.A subject to the terms of this Permit and as specified below:

III.B.1.

Waste Description No.	State/EPA Hazardous Waste
242-A Evaporator Process Condensate	F003, F005, WT02
242-A Evaporator Process Condensate spiked with the constituents in listed on Table 3-2 of Attachment 3 of this Permit.	F003, F005, WT02

III.B.2. Maximum constituent concentration levels in the wastes specified in permit condition III.B.1. shall be limited to the concentration levels specified on Table 3-4 of Attachment 3 of the Permit.

III.B.3. Maximum percent of total organics in waste limited to less than 10% by weight.

III.C. **CONTAINER MANAGEMENT**

III.C.1. The maximum amount of container storage and/or treatment shall be 10,000 gallons in tanker trailer containers, with each Tanker Trailer Container having a maximum capacity of 5,000 gallons as specified in Section 4.3.3.1, Attachment 4 of this permit.